



Federal Communications Commission  
Washington, D.C. 20554

September 2, 2015

**VIA ECFS ELECTRONIC DELIVERY**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Re: Measuring Broadband America Program (Fixed Collaborative), GN Docket No. 12-264

Dear Ms. Dortch:

On September 2, 2015, representatives of broadband providers, public interest groups, companies, and other organizations met via conference call with Commission staff to discuss ongoing analysis of data collection anomalies discussed at the August 18, 2015 fixed Measuring Broadband America (MBA) fixed collaborative meeting.<sup>1</sup>

Mr. Walter Johnston, Chief Electromagnetic Compatibility Division (EMCD), and James Miller, Senior Attorney Advisor welcomed collaborative members. Mr. Johnston introduced Sam Crawford, Samknows to discuss results of ongoing research and analysis by Samknows and Measurement Lab (M-Lab) into collection anomalies observed for test results of higher speed tiers in the MBA study.

Continuous monitoring and management by Samknows in the months leading up to July 2015 identified that test results for whiteboxes on higher speed tiers resulted in increased utilisation across M-Lab sites. From spring 2015 onward the rise in utilization slowly began to affect multiple speed tiers but the most pronounced impacts were observable on speeds tiers of 50 Mbps and above, when comparing tests executed on M-Lab servers with results of tests using Level-3 and other on-net servers. On July 1, 2015, Samknows introduced newly provisioned M-Lab provisioned servers in the MBA program, and observed a decline to typical levels for differences in test results for tiers under 100 Mbps between measurement servers in the MBA infrastructure.

Mr. Crawford explained that following the introduction of the new M-Lab server resources in

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<sup>1</sup> A list of attendees and presentation materials are attached to this filing in GN Docket No. 12-264.

July 2015, anomalies in performance between M-Lab, and Level-3 and on-net servers persist for faster than 100Mbps tiers, albeit at levels less pronounced than the pre-July levels. Extensive review of the server environments reveal no evidence of network or resource capacity issues at M-Lab sites, and analysis of results show that anomalies are not isolated to one particular site or ISP.

Mr. Johnston indicated that investigation into the cause and potential remedies to the anomalies were ongoing, and that SamKnows, M-Lab, carriers and Commission staff would continue to work with M-Labs closely to identify and resolve the issues.

Mr. Johnston announced that staff would announce a followup meeting in the coming weeks to update collaborative members on the progress of the investigation. He explained that the 2015 fixed measurement collection had commenced on Tuesday September 1, 2015, and that in response to the ongoing work staff would evaluate options described in the data anomaly policy, including possibly extending measurement month till Saturday, October 31st 2015

Mr. Johnston thanked all the participants for their active participation in these meetings and encouraged participants to look for an invitation to the upcoming conference call via the collaborative distribution list in the coming weeks and closed the meeting.

Sincerely,

/s/ James Miller

James Miller, Senior Attorney Advisor  
Electromagnetic Compatibility Division/OET  
Federal Communications Commission